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Attorney for Rene Ramirez

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
RENE RAMIREZ,  
Defendant

Case No. 2:15-cr-00289-JCM-CWH

**STIPULATION TO CONTINUE  
REVOCATION HEARING  
(Third Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the United States of America, and Yi Lin Zheng, counsel for Rene Ramirez, that the revocation hearing currently scheduled for March 20, 2024 be vacated and set to a date and time convenient to this Court, but no sooner than ninety (90) days.

The Stipulation is entered into for the following reasons:

1. Mr. Ramirez will be pleading guilty without a plea agreement in his federal SORNA case, 21-cr-215-JAD-NJK.

2. The parties anticipate that Mr. Ramirez will be sentenced within 90 days of his change of plea.

3. Mr. Ramirez's sentence in the SORNA case will affect defense counsel's sentencing strategy in this case.

1       4. The parties agree to the continuance.

2       5. Mr. Ramirez is in custody and does not object to a continuance.

3       6. The additional time requested herein is not sought for purposes of delay, but  
4 merely to allow counsel for defendant sufficient time within which to be able to effectively and  
5 complete investigation of the discovery materials provided. Additionally, denial of this request  
6 for continuance could result in a miscarriage of justice.

7              This is the second stipulation to continue filed herein.

8              DATED: March 4, 2024.

9              By /s/ Yi Lin Zheng

10             YI LIN ZHENG  
11             Counsel for Rene Ramirez

            JASON M. FRIERSON  
            United States Attorney

12              By /s/ Supriya Prasad

13             SUPRIYA PRASAD  
14             Assistant United States Attorney

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## FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

## **FINDINGS OF FACT**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Mr. Ramirez will be pleading guilty without a plea agreement in his federal SORNA case, 21-cr-215-JAD-NJK.

2. The parties anticipate that Mr. Ramirez will be sentenced within 90 days of his change of plea.

3. Mr. Ramirez's sentence in the SORNA case will affect defense counsel's sentencing strategy in this case.

4. The parties agree to the continuance.

5. Mr. Ramirez is in custody and does not object to a continuance.

6. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided. Additionally, denial of this request for continuance could result in a miscarriage of justice.

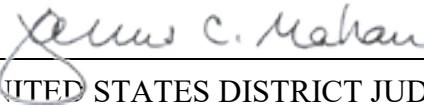
1                   **CONCLUSIONS OF LAW**

2                   The ends of justice served by granting said continuance outweigh the best interest of the  
3 public and the defendant in a speedy trial, since the failure to grant said continuance would be  
4 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the  
5 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into  
6 account the exercise of due diligence.

7                   **ORDER**

8                   IT IS FURTHER ORDERED that the revocation hearing is continued to **June 24,**  
9 **2024, at 10:00 a.m.**

10                  DATED March 8, 2024.

11                    
12                  \_\_\_\_\_  
13                  UNITED STATES DISTRICT JUDGE